

**BOIES SCHILLER FLEXNER LLP**

David Boies (admitted pro hac vice)  
 333 Main Street  
 Armonk, NY 10504  
 Tel.: (914) 749-8200  
 dboies@bsfllp.com

Mark C. Mao, CA Bar No. 236165  
 Beko Reblitz-Richardson, CA Bar No. 238027  
 44 Montgomery St., 41st Floor  
 San Francisco, CA 94104  
 Tel.: (415) 293-6800  
 mmao@bsfllp.com  
 brichardson@bsfllp.com

James Lee (admitted pro hac vice)  
 Rossana Baeza (admitted pro hac vice)  
 100 SE 2nd St., 28th Floor  
 Miami, FL 33131  
 Tel.: (305) 539-8400  
 jlee@bsfllp.com  
 rbaeza@bsfllp.com

Alison L. Anderson, CA Bar No. 275334  
 M. Logan Wright, CA Bar No. 349004  
 2029 Century Park East, Suite 1520  
 Los Angeles, CA 90067  
 Tel.: (213) 995-5720  
 alanderson@bsfllp.com  
 mwright@bsfllp.com

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL  
 CATALDO, JULIAN  
 SANTIAGO, and SUSAN LYNN  
 HARVEY, individually and on behalf of all  
 others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

**SUSMAN GODFREY L.L.P.**

Bill Carmody (admitted pro hac vice)  
 Shawn J. Rabin (admitted pro hac vice)  
 Steven M. Shepard (admitted pro hac vice)  
 Alexander Frawley (admitted pro hac vice)  
 Ryan Sila (admitted pro hac vice)  
 One Manhattan West, 50<sup>th</sup> Floor  
 New York, NY 10001  
 Tel.: (212) 336-8330  
 bcarmody@susmangodfrey.com  
 srabin@susmangodfrey.com  
 sshepard@susmangodfrey.com  
 afrawley@susmangodfrey.com  
 rsila@susmangodfrey.com

Amanda K. Bonn, CA Bar No. 270891  
 1900 Avenue of the Stars, Suite 1400  
 Los Angeles, CA 90067  
 Tel.: (310) 789-3100  
 abonn@susmangodfrey.com

**MORGAN & MORGAN**

John A. Yanchunis (admitted pro hac vice)  
 Ryan J. McGee (admitted pro hac vice)  
 Michael F. Ram, CA Bar No. 104805  
 201 N. Franklin Street, 7th Floor  
 Tampa, FL 33602  
 Tel.: (813) 223-5505  
 jyanchunis@forthepeople.com  
 rmcgee@forthepeople.com  
 mram@forthepeople.com

Case No.: 3:20-cv-04688-RS

**ADMINISTRATIVE MOTION TO  
 CONSIDER WHETHER ANOTHER  
 PARTY'S MATERIAL SHOULD BE  
 SEALED**

The Honorable Richard Seeborg  
 Courtroom 3 – 17th Floor  
 Trial Date: August 18, 2025

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC's ("Google") material should be sealed. The material is included within Plaintiffs' Appeal from Order Granting Google's Motion to Exclude Sundar Pichai.

Document Sought to Be Sealed	Party Claiming Confidentiality	Basis for Sealing
Highlighted portions of Plaintiffs' Appeal from Order Granting Google's Motion to Exclude Sundar Pichai	Google	Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" by Google pursuant to the Protective Order

Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the responsibility to establish that its designated material is sealable.

Dated: May 20, 2025

By /s/ Mark C. Mao

Mark C. Mao (CA Bar No. 236165)

mmao@bsfllp.com

Beko Reblitz-Richardson (CA Bar No. 238027)

brichardson@bsfllp.com

BOIES SCHILLER FLEXNER LLP

44 Montgomery Street, 41<sup>st</sup> Floor

San Francisco, CA 94104

Telephone: (415) 293 6858

Facsimile (415) 999 9695

David Boies (*pro hac vice*)

dboies@bsfllp.com

BOIES SCHILLER FLEXNER LLP

333 Main Street

Armonk, NY 10504

Telephone: (914) 749-8200

James W. Lee (*pro hac vice*)

jlee@bsfllp.com

Rossana Baeza (*pro hac vice*)

rbaeza@bsfllp.com

BOIES SCHILLER FLEXNER LLP

100 SE 2<sup>nd</sup> Street, Suite 2800

Miami, FL 33130

Telephone: (305) 539-8400

Facsimile: (305) 539-1304

Alison Anderson (CA Bar No. 275334)

aanderson@bsfllp.com

M. Logan Wright, CA Bar No. 349004

mwright@bsfllp.com

BOIES SCHILLER FLEXNER LLP

2029 Century Park East, Suite 1520  
Los Angeles, CA 90067  
Telephone: (213) 995-5720  
Facsimile: (213) 629-9022

Amanda Bonn (CA Bar No. 270891)  
abonn@susmangodfrey.com  
SUSMAN GODFREY L.L.P.  
1900 Avenue of the Stars, Suite 1400  
Los Angeles, CA 90067  
Telephone: (310) 789-3100

Bill Christopher Carmody (*pro hac vice*)  
bcarmody@susmangodfrey.com  
Shawn J. Rabin (*pro hac vice*)  
srabin@susmangodfrey.com  
Steven Shepard (*pro hac vice*)  
sshepard@susmangodfrey.com  
Alexander P. Frawley (*pro hac vice*)  
afrawley@susmangodfrey.com  
Ryan Sila (*pro hac vice*)  
rsila@susmangodfrey.com  
SUSMAN GODFREY L.L.P.  
1301 Avenue of the Americas, 32<sup>nd</sup> Floor  
New York, NY 10019  
Telephone: (212) 336-8330

John A. Yanchunis (*pro hac vice*)  
jyanchunis@forthepeople.com  
Ryan J. McGee (*pro hac vice*)  
rmcgee@forthepeople.com  
MORGAN & MORGAN, P.A.  
201 N Franklin Street, 7th Floor  
Tampa, FL 33602  
Telephone: (813) 223-5505  
Facsimile: (813) 222-4736

Michael F. Ram, CA Bar No. 104805  
mram@forthepeople.com  
MORGAN & MORGAN  
711 Van Ness Ave, Suite 500  
San Francisco, CA 94102  
Telephone: (415) 358-6913

*Attorneys for Plaintiffs*